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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

Portland Division

Iran Thalassemia Association, et al.,

Plaintiffs,

VS.

Office of Foreign Assets Control, et al.,

Defendants.

Civil No. 3:22-CIV-1195

MOTION FOR PRELIMINARY INJUNCTION

EXPEDITED HEARING REQUESTED

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs Iran Thalassemia Society, H.K., A.M., S.N., M.M., FZ.H., F.E., and No Child Should Suffer (Oregon DNC), (collectively, "Plaintiffs"), by and through their attorneys, respectfully move this Court for a preliminary injunction as set out below and for the reasons set out in the accompanying Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction. Fed. R. Civ. P. 65(a). Because of the extreme nature of the irreparable injury to plaintiffs, an expedited hearing is requested.

WHEREFORE, Plaintiffs respectfully request the Court grant their Motion and issue a preliminary injunction pending a decision on the merits of Plaintiffs' claims in this

matter.

Dated at Zigzag, Oregon, this 15th day of August 2022.

/s/

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